

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.
SECURITIES LITIGATION

Case No. 12-cv-1341-G

This Document Relates To:

ALL ACTIONS.

**JOINT STIPULATION AND MOTION TO STAY OUTSTANDING MOTIONS
AND DEADLINES AS TO DEFENDANTS JAMES BENNETT AND MATTHEW
GRUBB AND TO SET DATE FOR PRELIMINARY SETTLEMENT APPROVAL
MOTION**

Defendants James Bennett and Matthew Grubb and Lead Plaintiffs Laborers Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Angelica Galkin (“Lead Plaintiffs”), by and through their undersigned counsel, submit the following stipulation and jointly move the Court to stay all pending motions and outstanding case deadlines applicable to Messrs. Bennett and Grubb, and to set a date for Lead Plaintiffs to file a motion for preliminary approval of a proposed settlement agreement between Messrs. Bennett and Grubb (together, the “Parties”).

STIPULATION AND JOINT MOTION

WHEREAS, on December 21, 2016, Lead Plaintiffs filed a Third Consolidated Amended Complaint for Violations of the Federal Securities Laws (ECF No. 225);

WHEREAS, on February 2, 2018, Lead Plaintiffs filed a Motion for Class Certification (ECF No. 268);

WHEREAS, on September 30, 2019, the Court entered an Order granting Lead Plaintiffs' Motion for Class Certification and certifying a class under Federal Rule of Civil Procedure 23(a) and (b)(3) (ECF No. 453);

WHEREAS, pending before the Court are numerous Outstanding Motions, as defined in the Court's Twelfth Amended Scheduling Order (ECF No. 531), including, *inter alia*, Messrs. Bennett and Grubb's Motion for Summary Judgment (ECF No. 479); as well as Defendants' Motion for Reconsideration Under Rule 54(b) (ECF No. 483) and multiple *Daubert* motions to exclude expert testimony (ECF Nos. 475, 487);

WHEREAS, the Parties participated in an in-person mediation with Judge Layn R. Phillips on December 13, 2019, and continued settlement discussions thereafter;

WHEREAS, on June 7, 2021, Lead Plaintiffs and Defendant Tom L. Ward filed a Stipulation and Joint Motion to stay outstanding motions and deadlines as to Mr. Ward and to set a date for Lead Plaintiffs' preliminary settlement approval motion;

WHEREAS, the Parties have now reached an agreement in principle to settle all claims asserted against Messrs. Bennett and Grubb, subject to, among other items, definitive documentation and the Court's approval, and Messrs. Bennett and Grubb request to join in Mr. Ward's motion to stay;

WHEREAS, the Parties are continuing to formalize the final terms of the settlement;

NOW THEREFORE, MESSRS. BENNETT AND GRUBB AND LEAD PLAINTIFFS HEREBY STIPULATE AND MOVE THE COURT TO ISSUE THE FOLLOWING ORDER:

1. Messrs. Bennett and Grubb's motion for summary judgment, and all other Outstanding Motions and pending deadlines with respect to Messrs. Bennett and Grubb, are stayed;
2. Lead Plaintiffs will move for preliminary approval of the settlement on or before September 1, 2021 or, if unable to do so by that date, Lead Plaintiffs will file a further stipulation requesting additional time to seek preliminary settlement approval.

IT IS SO STIPULATED

Dated: August 2, 2021

Respectfully submitted,

CROWE & DUNLEVY

/s/ Evan G.E. Vincent

Evan G.E. Vincent, OBA #22325

(Signed by filing Attorney with permission of Attorney)

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Dated: August 2, 2021

Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD
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/s/ Evan J. Kaufman

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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2021, I electronically transmitted the attached Joint Stipulation and Motion to Stay Outstanding Motions and Deadlines as to Defendants James Bennett and Matthew Grubb and to Set Date for Preliminary Settlement Approval Motion using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

/s/ Evan G.E. Vincent